



UNITED STATES OF AMERICA
Federal Trade Commission
Washington, D.C. 20580

Division of Financial Practices
Bureau of Consumer Protection

VIA CM/ECF

March 18, 2024

Hon. Sarah L. Cave
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
Courtroom 18A
500 Pearl Street
New York, NY 10007

RE: *Federal Trade Commission v. Voyager Digital, LLC, et al.*, No. 1:23-cv-08960-GHW-SLC (S.D.N.Y.)

Joint Letter on the Status of Discovery

Dear Magistrate Judge Cave:

Pursuant to the Court's Telephone Conference Scheduling Order, ordered on January 23, 2024, the Federal Trade Commission ("FTC") and Defendant Stephen Ehrlich and Relief Defendant Francine Ehrlich (together with the FTC, "the parties") respectfully submit the following report.

The parties have exchanged discovery requests pursuant to the Joint Report of Rule 26(f) Conference and Case Management Plan order, and will be exchanging responses and objections today. Last month, the parties negotiated and jointly submitted a Protective Order governing confidential and sensitive personal information, which the Court entered on February 14, 2024. They also jointly submitted a Joint Electronic Discovery submission and order, which the Court entered on February 20, 2024.

The parties are not aware of any issues requiring the Court's attention at this time, but should the exchange of discovery lead to any issues, the parties will attempt in good faith to resolve the issues, and if unable to, will bring them to the Court's attention.

Respectfully submitted,

FOR PLAINTIFF:



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/s/ Sanya Shahrabi
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CERTIFICATION

The undersigned hereby certifies that all counsel whose /s/ signature appears on the foregoing document have consented to the use of their /s/ signature.

Dated: March 18, 2024

/s/ Sanya Shahrabi

Sanya Shahrabi

Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served upon all parties that have entered an appearance in this matter via the Court's CM/ECF system. The above document was further served on March 18, 2024, by email to counsel as follows, pursuant to agreement, *see* Fed. R. Civ. P. 5(b)(2)(E):

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Dated: March 18, 2024

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